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## REMARKS

The claims of this application are being resubmitted in unamended form on the grounds that the Examiner has misinterpreted the primary reference. However, claim 4 has been corrected to include a proper prefix, and claim 14 has been amended to now depend from claim 13.

Claims 1-6, 11 and 15-23 stand rejected under 35 U.S.C. §103 in view of Delanoy in combination with Elliott, published U.S. Application No. 2002/0156779. However, as the Delanoy reference is, in and of itself, deficient with respect to important disclosures, anticipation is precluded, and prima facie obviousness cannot be established.

This invention resides in a text and imagery *correlator*. According to claim 1, a method according to the invention comprises the steps of providing textual material and imagery, and training a text search detector to examine the textual material for text regions which relate to a target concept. In the end, records from text and image databases are compared to determine a correlation status indicative of a common target concept.

The Delanoy reference is entirely related to imagery, and has nothing to do with text searching or correlation. Indeed, referring to the background of the invention of the '888 patent, reference is made to text retrieval, utilizing content-based keywords, and so forth. But this is done only to demonstrate that the equivalent for image searching is undeveloped and inferior. The Examiner keeps referring to column 3, lines 10+, making specific reference to phrases such as "various attributes," as though this means text, *but it does not*. Rather, it is clear when one reads the entire disclosure of the '888 patent, that "various attributes" refers solely to visual attributes, and has nothing to do with the input of text, let alone training an agent to examine the text and a method wherein the text is compared to visual characteristics for the purposes of a more comprehensive correlation. The only other independent claim, apparatus claim 18, also includes text specific references, including a "document text parsing and interpretation engine" and "a matching subsystem operative to associate topical information with location information and present a result to the user." Clearly, the '888 patent does not disclose any such system features.

With respect to the rejection under 35 U.S.C. §103(a), even in combination with the Elliott reference, given that Delanoy does not disclose the basic invention, prima facie obviousness has not

been established. Taking the rejection of claim 7 as an example, the Examiner states that "Delanoy teaches the searching of the text regions, referring to 'various attributes,'" citing column 3, line 13. Again, Delanoy simply does not disclose such a step or technique. In addition, it is well settled that in order to reject a claim on obviousness grounds a proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984). If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious. *In re Ratti*, 270 F.2d 810, 123 USPQ 349 (CCPA 1959). The argument that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. *In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990). In this case, there is no teaching or suggestion in either reference as to their combination, thereby further precluding prima facie obviousness.

Based upon the foregoing, Applicant believes all claims are in condition for allowance. To expedite prosecution, the undersigned attorney may be reached by telephone, facsimile or electronic mail.

Respectfully submitted,

By: _____

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